

# *City of Millersville*

1246 Louisville Highway  
Millersville, TN 37072-3613

Phone: (615) 859-0880  
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*Office of the Codes Administrator*  
Karen.smith@cityofmillersville.com

December 16, 2010

TDEC – Division of water Pollution  
L & C Tower Annex, 6<sup>th</sup> Floor  
401 Church Street.  
Nashville, TN 37243

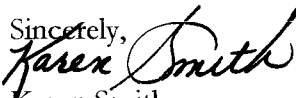
Dear TDEC:

## **Notice of Intent – City of Millersville**

Enclosed you will find the City of Millersville's NOI for the NPDES Permit #TNS077887.

I have completed this Notice to the best of my ability; please let me know if there is more you require from us. We are happy to provide anything else you may need.

Have a Happy Holiday Season.

Sincerely,  
  
Karen Smith  
Codes Administrator  
City of Millersville

WPC Permit Section  
**RECEIVED**

DEC 20 2010

TN Division Of Water  
Pollution Control





**Tennessee Department of Environment and Conservation  
Division of Water Pollution Control  
L & C Tower Annex, 6th Floor  
401 Church Street  
Nashville, Tennessee 37243**

**Phase II Stormwater Permit Notice of Intent (NOI)  
Phase II Municipal Separate Storm Sewer Systems (MS4)**

**PURPOSE**

The purpose of this Notice of Intent (NOI) is for a Tennessee city, county, utility district or military base to apply for NPDES permit to discharge stormwater runoff from a Phase II municipal separate storm sewer system.

**INSTRUCTIONS**

You must provide the following information to the Division of Water Pollution Control as application material. You may print this form blank and complete it on paper, or you can complete the form electronically. The document is a Microsoft Excel 2000 document. Submit two paper copies, one of which must bear an original signature on page three.

The following questions are intended to highlight minimum program requirements under the MS4 permit. Each element not currently performed must be implemented by the expiration date.

After completing the questions in each section, list the Best Management Practices (BMPs) that you will implement in each area based on a set of priorities you have identified in the area.

NOTE: You may not desire to dictate the ways in which the public participates or is involved in the stormwater quality management program; in this case, your proposed program should provide a forum and a structure by which to encourage or allow the public to participate. On the other hand, there may be specific ways you do want the public to be involved, based on your program needs. For instance, you may want stream watch groups to be organized. As such, your proposed program should describe how you will accomplish this, and the time schedule.

After completing the BMP's in each section provide the administrative information to complete those BMP's as explained here:

Primary Contact and Position/Title	The person in your organization serving as the primary contact.
Other Department and Roles	Other departments within your organization involved in the project and how their role is identified.
Other Government Entity and Roles	Identification of other government entities responsible for implementing one or more of the BMP's. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.
Other Institutions and Roles	Identification of partnerships with another MS4 operator or institution (e.g., Chamber of Commerce, environmental interest organizations, civic groups) to achieve the BMP's.
Equipment Needs (if applicable)	What are these needs, why does WPC need this information?
Target Groups (if applicable)	Specific kinds of groups that will be targeted, such as service industries (i.e., carpet cleaning), civic groups, schools, and church groups, etc.

Attached at the end this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

**PART 1  
ADMINISTRATIVE INFORMATION**

Name of city, county, stormwater utility district or other public institution that operates a Phase II MS4:

Mayor Dan Toole

Responsible elected Official or Officer

Mayor

Title

1246 Louisville Highway

Millersville

TN

37072

Street Address

City

State

Zip Code

**PROGRAM CONTACT**

Karen Smith

Name

karen.smith@cityofmillersville.com

Email Address

**TECHNICAL CONTACT**

Same

Name

Email Address

**Phase II Stormwater Permit Notice of Intent (NOI)**  
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**PROGRAM CONTACT (Continued)**

**TECHNICAL CONTACT (Continued)**

615-859-0880

Phone Number

Name

☒ Attach an organizational chart that shows the different departments involved in stormwater management.

**PART II**  
**DESCRIPTION OF STORM SYSTEM**

**ITEM A**  
**AREA SERVED (IN SQUARE MILES)**

If City, Town, or Utility District: Jurisdiction in square miles within current corporate boundaries: 12.77 Square Miles

If City, Town, or Utility District: Additional area of urban growth boundary: 7.68 Square Miles

The permit will be used to regulate the:

☐ UA portions, as follows (describe):

☐ Entire County

Unincorporated Area

If County: Total Area:

Unincorporated, Urbanized Area

**ITEM B**  
**STORM DRAINAGE INFRASTRUCTURE**

Give figures for the following features of stormwater drainage infrastructure owned or operated by the local government. For a county government, indicate whether the figures represent the entire county or only the urbanized area. Figures for length and number of culverts and catch basins may be rough estimates.

Entire County	_____	Urbanized Area(s)	_____
Storm Sewers	Miles <u>13,830 Feet</u>	Open Ditches	<u>49 Miles</u> Feet
Culverts	<u>429 (estimate number)</u>	Catch Basins	<u>154 (estimate number)</u>
Retention Basins	<u>2 (estimate local government operated number)</u>	Detention Basins	<u>4 (estimate local government operated number)</u>

**ITEM C**  
**MAPS (EACH MUST CLEARLY OUTLINE ALL OF THE REQUESTED INFORMATION)**

Zoned areas for commercial or industrial activity	<u>X</u>	State vocational, technical, college or universities	<u>N/A</u>
Actual areas of commercial or industrial activity	<u>X</u>	Federal vocational, technical, college or universities	<u>N/A</u>
Other municipally owned/operated industrial activities	<u>X</u>	City Roads	<u>X</u>
Municipal or County Wastewater Treatment Plants	<u>N/A</u>	County Roads	<u>N/A</u>
Vehicle Fleet Maintenance Centers	<u>X</u>	Perennial and intermittent streams	<u>X</u>
Power Plants	<u>N/A</u>	Topography or Drainage Patterns	<u>X</u>
Airports	<u>N/A</u>	Landfills	<u>N/A</u>
Military Installations	<u>N/A</u>		

**ITEM D**  
**IDENTIFYING IMPAIRED STREAMS AND OTHER WATER BODIES**

Identify any streams (that flow through your jurisdiction or within two miles downstream jurisdiction boundaries) that are impaired according to the later of either the State's 305(b) report or the State's 303(d) report. For any impairment, indicate the nature of pollution (cause) and the source.

STREAM NAME	CAUSE OF IMPAIRMENT	SOURCE OF IMPAIRMENT
Slaters Creek	Sedimentation/Siltation	Streambank Modifications/destabilization Sand/gravel/rock Mining or Quarries
	Escherichia coli	Discharges from Municipal Separate Storm Sewer Systems (MS4)

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Mansker Creek	Escherichia coli  Sedimentation/ Siltation	Discharges from Municipal Separate Storm Sewer Systems (MS4)  Site Clearance (Land Development or Redevelopment)

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**ITEM E**

**HAS THE STATE OR EPA ISSUED A TDML FOR ANY STREAMS DIRECTLY AFFECTED BY RUNOFF FROM YOUR MS4?**

Yes ☒ No ☐ If yes, list stream segment(s) and parameter(s) of concern:

STREAM SEGMENT	PARAMETERS OF CONCERN
TN05130202220_0300	11.3 Miles
TN05130202220_2000	7.6

**PART III**

**EXISTING LEAGAL AUTHORITY TO CONTROL STORMMMWATER DISCHARGES TO MS4**

You must review ordinances that apply to the control of pollution that might enter the MS4. Extract those portions of your ordinances that do apply to control of the storm sewer system and attach a copy of those portions to this NOI. Ordinances that deal with stormwater issues might be found, for example, in conjunction with litter control, prohibition of dumping, clean up of spills, grading/building permits, sewer connection ordinances, erosion and sediment practices, subdivision regulations or other land use/development ordinances.

**PART IV**

**YOUR PROPOSED STORMWATER QUALITY MANAGEMENT PROGRAM**

This NOI requires you to provide a brief description of your existing and planned activities as well as your Best Management Practices (BMP) for a stormwater management program. The following sections correspond to the six minimum control measures for a Phase II stormwater management program. If another MS4 will be responsible for implementing any or all portions of any or all following six minimum measures, then attach either the interlocutory agreement or the proposed agreement and schedule for adoption. You must still complete this NOI by answering the relevant questions for the six following measures.

**PART V**

**SIGNATURE OF RESPONSIBLE CORPORATE OFFICER**

This Notice of Intent (NOI) must be signed as follows: For a municipality, state, federal, other public agency, and/or co-permittees by either a principal executive officer or ranking elected official. For purposes of this section, a principal executive officer of a Federal agency includes one of the following:

- i. The chief executive officer of the agency.
- ii. A senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., Regional Administrators of EPA).

*"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."*

Signature	City Manager, City of Millersville Title/Municipality	Date
Signature	Title/Municipality	Date
Signature	Title/Municipality	Date
Signature	Title/Municipality	Date
Signature	Title/Municipality	Date
Signature	Title/Municipality	Date

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**SIGNATURE OF RESPONSIBLE CORPORATE OFFICER (Continued)**

Signature

Title/Municipality

Date

**SECTION 1  
PUBLIC EDUCATION AND OUTREACH**

1. Does the municipality currently distribute educational materials on the topics of stormwater quality, stream water quality, pollution impacts, pollution prevention, etc.? If yes, briefly describe the materials, including media used (e.g., written brochures, public service announcements, etc.); the topic(s) covered, intended target audience(s), and the distribution method.

Yes ☒

1. Brochures (Covering - Pollution Prevention by the average citizen, Information for local businesses concerning fines for stormwater violations, clean water and siltation and E. coli, Project Wet, Best Management Practices for Gardeners) distributed in city hall on the information table, in school teacher's annual information packets, at local events and mailed directly to local businesses [targeting teachers and students and the average citizen of Millersville]; 2. Posters (concerning - Stream Watch, Minimum Standards for Automotive Repair and Maintenance, Water Tips) mailed to businesses, placed at Safety Day Booths and other local functions [targeting automotive businesses]; 3. Door Knob Hangers (Concerning Pollution found in the area) left on the front doors [targeting neighbors living in an area of concern]; 4. Activity Sheets (Concerning Water Pollution Awareness, Community Needs assessment) placed at booths during local events, placed in school teacher packets, and placed on information table in city hall [targeting students]; 5. Training Documents (Stream Watch Sponsorship, Rain Gardens, Chemical Sampling, Macro-invertebrate sampling, visual stream assessments, and Stream Watch Committee, Stream Impairment causes) distributed at Stream Watch Meetings, Garden Club Meetings, and Business Forum Meetings [targeting Garden Club members, business owners, Stream Watch Committee Members]; 6. Letters (Concerning - Stream Watch and impaired streams in Millersville) sent to Stream Watch members and potential members [targeting Stream Watch Members]; 7. Postcards (Concerning Stream Watch, Sponsorship) sent to potential Stream Watch Sponsors and citizens living on or near the impaired creeks [targeting Business Owners on the Stream and Stream Watch Members]; 8. Community Needs Assessment Worksheets provided to citizens to complete and return [targeting citizens to get them involved]; 9. Flyers (Concerning Project Learning Tree, Project Wet) sent to teachers [targeting teachers for inservice training]; 10. Power Point Presentations (concerning - post construction BMPs, homeowner's guide to cleaner water, simple steps to reduce pollution) on the Internet, and in person during pre-construction conferences [targeting builders, contractors, landscape companies, local citizens, students]; 11. Speaking engagements and seminars (concerning businesses and the stormwater program, what stormwater is and how it effects Millersville) given at Civic Club, Garden Club, and seminar held at city hall for local businesses [targeting local citizens and business owners]

No ☐

2. Does the municipality currently conduct or participate in public outreach activities focusing on the topics of stormwater quality, stream water quality, pollution impacts, pollution prevention, etc.? If yes, briefly describe the outreach activities, topic(s) covered, intended target audience(s), and the frequency of activities.

Yes ☒

1. STREAM CLEANUP EVENTS (invite girl scout and boy scout troops and hold informative sessions teaching them how to collect and test water and helping the girl scouts achieve the "Water Drop" patch) [twice a year]; 2. TEACHER IN-SERVICE (Project Learning Tree and Project Wet) [once each] 3. STREAM WATCH COMMITTEE Meetings (train local citizens to monitor and test water and help with cleanup events) [four to five times each year]

No ☐

3. Does the current municipal stormwater management program comply with Local, State and Federal public notice requirements? If yes, describe how the public is notified.

Yes ☒

"State of the Stream" report is given once a year at a meeting of the City Commission during a public hearing; and all changes to the ordinance are presented the same way with two readings and the last reading is also a public hearing. Public Hearing is advertised in local newspapers, on website, posting on front door and sign at city hall

No ☐

**BEST MANAGEMENT PRACTICES (BMPs) MEASURABLE GOALS AND IMPLEMENTATION MILESTONES**

	Name	DESCRIPTION
A.	EDUCATE THE GENERAL PUBLIC	Offer printed information at city hall, classrooms, local businesses, in local city newsletter mailed to all citizens, notes on sewer bills that are mailed to all citizens, at local events such as Safety Day Extravaganza and mailed directly to specific targeted citizens or citizen groups - Stormwater information in different locations throughout the city's website so more people will see it as well as a page dedicated to just that topic with PowerPoint presentations. Set up and man information booths at local events dealing specifically with storm water pollution and prevention and promote Stream Watch, Stream Cleanup and advertise what we have accomplished and what remains to be accomplished
B.	EDUCATE STUDENTS/TEACHERS	Offering in-service programs targeted at stormwater education; teacher packets given annually providing teachers with teaching aids; loan stormwater video to classrooms

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C.	EDUCATE SPECIAL INTEREST GROUPS	Through printed media and offering special speakers to address the group - some form of training at each quarterly meeting of Stream Watch and in turn use the volunteers to educate the general public during events such as "Safety Day Extravaganza" by manning booths that emphasize clean water and stream cleanup events and other aspects of Stormwater
D.	EDUCATE LOCAL BUSINESSES	During inspections and through printed media - we also prefer to offer education in lieu of penalties for first-time offenders

**ADMINISTRATIVE INFORMATION**

PRIMARY CONTACT	POSITION OR TITLE
Karen Smith	Stormwater Manager and Codes Administrator
OTHER DEPARTMENT	ROLE
Public Works	Director Frank Wilkerson - Fleet management, Good Housekeeping and Municipal activities
Fire Department	Fire Chief kirt Brinkley - Spill Containment and abatement

GOVERNMENT ENTITY	BMP
City of Goodlettsville	City of Goodlettsville partnered with the "Slaters Creek Stream Watch" group and we changed the name to "Stream Watch" - this is a citizen-based group that reviews local SW ordinances, helps inspect and clean a portion of the creek and participates in Stream cleanup events
City of Goodlettsville	Mapped Mansker Creek Outfalls
Sumner County Stormwater Group and Tennessee Stormwater Association	Helps bring information to locals, training, cooperation among group members with stream cleanup events and bringing down costs by using the same companies and negotiating prices - networking opportunities

OTHER INSTITUTION	ROLE
Western KY University	A partnership helping to monitor and sample Slaters Creek - they are also involved in information gathering and research not mandated by TDEC but to help us better care for our stream and help educate the next generation
Austin Peay State University	Project Wet, Project Learning Tree, Mapped Outfalls in Slaters Creek
Forrestry Division - State of TN	Help with tree plantings and soil sampling and tree types, care and benefits of each

**EQUIPMENT NEEDS (IF APPLICABLE)**

GROUP	TARGET DESCRIPTION
Millersville Elementary School	Teachers, students and parents
Civic Club, Garden Club and general adult population	Local Citizens
Businesses and Development Community	Specifically targeting businesses with food waste and businesses with petroleum-based waste products as well as Developers, Builders, Landscaping Co., Contractors, Heavy equipment operators

**SECTION 2**  
**ILLICIT DISCHARGE DETECTION AND ELIMINATION**

The following are common sources of illicit discharges to an MS4:

- Sanitary Wastewater
- Car wash wastewaters
- Radiator flushing disposal
- Spills from roadway accidents
- Carpet cleaning wastewaters
- Effluent from septic tanks
- Improper oil disposal
- Laundry Wastewaters/gray water
- Improper disposal of auto and household toxics

**STORM SEWER SYSTEM MAP**

Does the municipality currently have a storm sewer system map completed for the entire regulated municipal separate storm sewer system? The map must depict, at a minimum: city streets, topography or drainage patterns, streams, and outfalls (points where the city or county-operated MS4 discharges into the streams or adjacent MS4s).

Yes ☒

No ☐



**Phase II Stormwater Permit Notice of Intent (NOI)**  
**Phase II Municipal Separate Storm Sewer Systems (MS4)**

**ILLCIT DISCHARGE ORDINANCES**

1. Does the municipality currently have an ordinance or regulatory mechanism that prohibits non-stormwater discharges into the storm sewer system? If yes, please attach a copy of the ordinance and give page number(s) of this section of ordinance. If No, proceed to the next section (inspections and enforcement).

Yes ☒ No ☐ 26-32 Page Number 19-111 Ordinance Section Number

2. Does the ordinance or regulatory mechanism clearly define non-stormwater discharges, either through a written description of a non-stormwater discharge or through a listing of unallowable or allowable non-stormwater discharges?

Yes ☒ No ☐

3. Does the ordinance or regulatory mechanism allow right-of-entry on private property for inspection of suspected discharges?

Yes ☒ No ☐

4. Does the ordinance or regulatory mechanism prohibit dumping?

Yes ☒ No ☐

5. Does the ordinance or regulatory mechanism give the MS4 owner/operator the authority to eliminate non-stormwater discharges in the event of violations? If yes, please note page number and paragraph number.

Yes ☒ No ☐ 3 and 4 Page Number 19-101 (c) (7), (8) AND 19-102 (f) Paragraph Number

6. What is maximum penalty in ordinance or regulatory? Please note maximum penalty, page number and paragraph number.

Yes ☒ No ☐ Maximum Penalty is \$5,000 per day violation continues pp. 33 Page Number 19-113 (b) Paragraph Number

7. Does the municipality have ordinance or other regulatory mechanism that prohibits contamination of stormwater runoff from "hot spots" including industrial and commercial properties, restaurants, auto repair shops, auto supply shops, and large commercial parking areas?

Yes ☒ No ☐

**INSPECTION/SCREENING AND ENFORCEMENT PROCEDURES**

1. Does the municipality presently have personnel and procedures in place for inspection and/or screening for non-stormwater discharges? If yes, please describe and indicated percentage of system inspected and/or screened.

Yes ☒ No ☐

2. Does the municipality presently have procedures and personnel in place for enforcement of violations of the illicit discharge ordinance? If yes, please describe.

Yes ☒ Continues on next page....

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We have two EPSC Level 2 Inspectors (Randy Harville and Karen Smith); they visit each site as set in the schedule and complete the "Checklist for Existing Commercial and Industrial Sites". The business owner is given the "Stormwater Questionnaire" and the FAQ document prior to inspection and is asked to have the form as complete as possible when we arrive.

**ORDINANCE: 19-112. Administrative enforcement**

(a) Notification of Violation. Whenever the Administrator finds that any permittee or any other person discharging storm water has violated or is violating this article or a permit or order issued hereunder, the administrator may serve upon such person written notice of the violation. Within ten (10) days of the receipt date of this notice, an explanation of the violation and a plan for the satisfactory correction and prevention thereof, to include specific required actions, shall be submitted to the Administrator. Submission of this plan in no way relieves the discharger of liability for any violations occurring before or after receipt of the notice of violation.

(g) Enforcement. Violations of this section of the Stormwater Ordinance could result in notices of violation, stop work orders, and/or municipal monetary penalties.

**19-113. Penalties**

(a) Violations - Any person who shall commit any act declared unlawful under this article, who violates any provision of this article, who violates the provisions of any permit issued pursuant to this article, or who fails or refuses to comply with any lawful communication or notice to abate or take corrective action by the City of Millersville, shall be guilty of a civil offense.

(b) (2) Penalties - Under the authority provided in Tennessee Code Annotated §68-221-1106, it is declared that any person violating the provisions of this article may be assessed a civil penalty by the City of Millersville of not less than fifty dollars (\$50.00) per day or more than five thousand (\$5,000.00) per day. Each day of violation may constitute a separate offense subject to the maximum fine under the authority provided in the Tennessee Code §68-221-1106.

**POLICY: XIV. STORMWATER ISSUES**

Some Stormwater violations are not intentional and the violator may not understand the violation at all. Policy. Since the typical citizen is not aware of most Stormwater issues, it is the policy of the city to use training techniques rather than enforcement techniques whenever possible.

Procedure. When a citizen of Millersville violates the Stormwater Ordinance, the code enforcement officer shall first research the file to see if previous violations have occurred. If this is the first violation of the Stormwater ordinance, the violator shall have the right to attend a training session at city hall before enforcement action is begun. A refusal to attend or a repeat offense will result in enforcement steps as outlined in Chapter 19 of the Municipal Code of Ordinances.

**Exceptions.**

1. Builders, developers and other professionals with knowledge of Stormwater issues are not eligible for this option.
2. Repeat offenders are not eligible for this option.
3. Violators who are not residents of the City of Millersville are not eligible for this option.

No ☐

**3. How are enforcement actions documented?**

A file is set up to be filed alphabetically by address; a complaint form is completed which outlines the offense. Next an inspection form is completed and a report filed with the administrator. Follow-up dates are placed in the tickler file and any enforcement action or Notices of Violation are copied to the file.

**4. Has the municipality defined "hot spots" for non-stormwater discharge screening and inspections? If yes, please describe and provide a map of illicit discharge screening priority areas.**

Yes ☒

No ☐

**PUBLIC INPUT AND COMPLAINTS**

1. Does the municipality presently have procedures in place to receive and consider information and complaints about non-stormwater discharges that are submitted by the public? If so, provide brief description: responsible departments, personnel, steps followed.

Yes ☒

We conducted a campaign and placed permanent signs around the city with the number to call to report illegal dumping and other pollution. It is the R.I.D. Campaign = Report Illegal Dumping and rid Millersville of all types of pollution. The phone number directs the caller to the Police Dispatch and depending on the time of day and the offense, it is handled by either a police officer, a compliance officer or the fire department. Complaints that are received in the codes office are documented on a "Complaint Form" and a file opened. City personnel visit site to verify complaint and enforcement begins when appropriate.

No ☐

**EDUCATION**

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1. Has the municipality educated the public and businesses including auto parts supply, auto repair shop and restaurants, regarding ways to detect, prevent and eliminate illicit discharges? If yes, briefly describe the educational materials, including media used (e.g., written brochures, public service announcements, etc.), the topic(s) covered, intended target audience(s), and the distribution method.

Yes ☒

No ☐

Held a seminar conducted by MTAS for all businesses in the city. Brochures to advertise the event were distributed to every business. The seminar covered the Clean Water Act; business responsibility; MS4's and the NPDES permit; inspections and penalties for noncompliance. Also posters were sent to all automotive repair facilities that included Quick Facts from the EPA concerning BMPs for Automotive repair and maintenance.

BEST MANAGEMENT PRACTICES (BMPs) MEASURABLE GOALS AND IMPLEMENTATION MILESTONES		
	Name	DESCRIPTION
A.	Stream Assessments and Outfall Inventory	Monitor all identified outfalls for possible illicit discharges and continue visual assessments
B.	R.I.D. Campaign	Continue to promote the Report Illegal Dumping and other pollution Campaign and get the citizenry behind the program
C.	Public Participation	Participate in and involve public groups in World Water Monitoring Day to test for pH levels, Dissolved Oxygen, temperature, and turbidity. Continue to hold Stream Watch meetings and encourage the committee members to monitor their assigned section of the stream. Label all storm drains that have not previously been marked
D.	Inspections	Continue to inspect all "hot Spot" areas and educate the owners and operators

ADMINISTRATIVE INFORMATION	
PRIMARY CONTACT	POSITION OR TITLE
Karen Smith	Stormwater Manager - Codes Administrator
OTHER DEPARTMENT	ROLE
Public Works Director Frank Wilkerson	Good Housekeeping, training PW Workers
Fire Chief Kirt Brinkley	Spill and illicit discharge abatement

GOVERNMENT ENTITY	BMP

OTHER INSTITUTION	ROLE

EQUIPMENT NEEDS (IF APPLICABLE)

GROUP	TARGET DESCRIPTION
Hot Spots and other existing businesses	Educating all businesses, industries, etc. that are classified as Hot Spots either due to the activity on the site or the general location of the stream to the activity.
Stream Watch and general public	education at each Stream Watch meeting, written materials, videos, and through the use of our Local Newsletter, website, and stream cleanup events
Construction site operators	Pre-construction conference, printed materials, onsite visits, education in lieu of initial penalties and inspections

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**SECTION 3**  
**CONSTRUCTION SITE RUNOFF PROGRAM**  
**CONSTRUCTION SITE RUNOFF ORDINANCES**

1. Do the current ordinances/regulations for the municipal stormwater management program comply with Local, State and Federal public notice requirements? If yes, describe how the public is notified.

Yes ☒  
No ☐

A public Hearing is advertised in two major papers prior to the meeting date, posted on door of city hall, sign in front of city hall and on website calendar

2. Do you currently have an erosion prevention and sediment control - or similar - ordinance or regulatory mechanism? If yes, include a copy and reference the page number(s). If No, proceed to the next set of questions below about construction site plans review.

Yes ☒

No ☐

Section 19-106 - Pages 17-22 Page Number

3. Does the ordinance or regulatory mechanism require that site operators implement erosion prevention, sediment control, and other construction waste controls for land disturbance activities?

Yes ☒

No ☐

4. Does the ordinance/regulatory mechanism require (explicitly or implicitly) that controls be implemented for any land disturbances greater than or equal to one acre, or less than one acre if part of a large common plan of development or sale that would disturb one acre or more? If yes, note the page number and paragraph number where this is defined.

Yes ☒ No ☐

12 Page Number

(a) Paragraph Number

5. Does the ordinance or regulatory mechanism contain or reference technical standards for erosion and sediment control? If yes, note the page number and paragraph number where this is defined.

Yes ☒ No ☐

17-22 Page Number

(a) - (f) Paragraph Number

6. Do those technical standards meet with or exceed the current TDEC construction general permit sections 3.5 and 4.4?

Yes ☒

No ☐

7. Do technical standards require that construction activities maintain temporary water quality buffers during construction?

Yes ☒

No ☐

8. Does the ordinance or regulatory mechanism clearly define the criteria - primarily who must submit - for submitting erosion and sediment control information or plans? If yes, note page number and paragraph number

Yes ☒ No ☐

12-14 Page Number

(b) (1) and (d) (10) Paragraph Number

9. Does the ordinance or regulatory mechanism require approval by the local government prior to commencement of land disturbance activities? If yes, note page number and paragraph number.

Yes ☒ No ☐

14-15 Page Number

(e) and (g) Paragraph Number

10. Does the ordinance or regulatory mechanism require re-submittal of erosion and sediment control information or plans if site plans or conditions change during land disturbance activities? If yes, note page number and paragraph number.

Yes ☒ No ☐

22 Page Number

19-108 2<sup>nd</sup> paragraph Paragraph Number

11. Does the ordinance or regulatory mechanism allow right-of-entry for government officials onto construction sites for inspections? If yes, note page number and paragraph number.

Yes ☒ No ☐

15 Page Number

(h) Paragraph Number

12. Does the ordinance or regulatory mechanism give the MS4 owner/operator the authority to STOP WORK in the event of non-compliance violations? If yes, note page number and paragraph number.

Yes ☒ No ☐

12 and 33 Page Number

(b) (2) and (e) Paragraph Number

**CONSTRUCTION SITE PLANS REVIEW**

1. Does the municipality presently have in place a technical review process (i.e. engineering department, planning department, zoning board) that evaluates new development and redevelopment construction for construction site runoff?

Yes ☒

No ☐

2. Does the technical review process require an erosion prevention and sediment control plan with appropriate BMPs?

Yes ☒

No ☐

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3. Does the review process include a requirement for pre-construction meeting between the municipality and site developer, for priority construction sites, including at a minimum those construction activities discharging directly into, or immediately upstream of, waters the state recognizes as impaired or high quality?

Yes ☒

No ☐

4. If there is a review process, provide a brief narrative or a flow chart of the process, describing the process steps, responsible personnel (by department, title and contact person), and criteria used for evaluation of information or plans that are submitted.

Yes ☒

No ☐

**RESPONDING TO PUBLIC INPUT AND COMPLAINTS**

1. Does the municipality presently have procedures in place for receipt and consideration of information and complaints submitted by the public?

Yes ☒

No ☐

If Yes, please provide a brief narrative of the receipt process and procedures, describing process steps, responsible departments, and personnel (by title). If available, provide information on complaint tracking, documentation, etc:

Complaints are submitted to either the Codes Enforcement Department or the Police Department; the responsible officer will visit the site to verify the validity of the complaint and take pictures to document the violations. Once the violation is verified, the site is either posted with the Notice of Violation, Stop Work Order, etc. or a Notice of Violation is sent to the responsible party. Our offices use both Outlook and tickler files to track and follow-up. All inspections are documented in writing and with pictures.

**ENFORCEMENT AND INSPECTION PROCEDURES**

1. Does the municipality presently have personnel and procedures in place for construction site runoff inspection?

Yes ☒

No ☐

2. Does the program provide for pre-construction meeting and monthly inspection of priority sites?

Yes ☒

No ☐

3. Does the municipality presently have procedures and personnel in place for enforcement to the maximum extend for violations of construction site requirements?

Yes ☒

No ☐

4. Does the municipality use a STOP WORK order to enforce non-compliance with construction site policies and requirements?

Yes ☒

No ☐

5. How are enforcement actions documented?

An inspection form is used for each inspection and placed in the address file of the site along with pictures that verify the findings. When an enforcement action is required, copies of all notices, fines and Stop Work orders are placed in the file.

**TRAINING AND EDUCATION**

1. Does the municipality presently make construction site runoff control training/information available to the public, developers, engineers, and contractors (Be aware that the state of Tennessee regularly conducts erosion prevention and sediment control classes across the state. Local governments are encouraged to refer developers and contractors to these classes.)?

Yes ☒

No ☐

2. Has municipal staff completed state-sponsored training, including the Tennessee Fundamentals of Erosion Prevention and Sediment Control; and the Erosion Prevention and Sediment Control Design Course?

Yes ☒ No ☐

**BEST MANAGEMENT PRACTICES (BMPs) MEASURABLE GOALS AND IMPLEMENTATION MILESTONES**

	Name	DESCRIPTION
A.	Pre-Construction Conference and Inspections	Continue pre-construction conferences and Construction site inspections

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B.	Ordinance	Review and update current ordinance to remain in compliance with permit requirements
C.	Review Process	Complete site plan review checklists and review all site plans for compliance with BMP's and erosion prevention and sediment control
D.	Enforcement	Continue enforcement with penalties, but add education in lieu of enforcement for first time offenders

**ADMINISTRATIVE INFORMATION**

PRIMARY CONTACT	POSITION OR TITLE
Karen Smith	Codes Administrator and Stormwater Manager

OTHER DEPARTMENT	ROLE
Public Works	Good Housekeeping and training of PW employees
Fire Department	Training for remediation and abatement as well as Good Housekeeping

GOVERNMENT ENTITY	BMP

**BEST MANAGEMENT PRACTICES (BMPs) MEASURABLE GOALS AND IMPLEMENTATION MILESTONES (CONTINUED)**

OTHER INSTITUTION	ROLE
TDEC	Adoption of their BMP Manual, training for EPSC Level 1 and Level 2
TNSA	Cooperation and education
Sumner County Stormwater Group	networking and education

**EQUIPMENT NEEDS (IF APPLICABLE)**

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GROUP	TARGET DESCRIPTION
Builders	knowledgeable about erosion prevention and sediment control and insure that all BMP's are working appropriately
Developers	knowledgeable about erosion prevention and sediment control and insure that all BMP's are working appropriately
Site Operators	knowledgeable about erosion prevention and sediment control and insure that all BMP's are working appropriately

**SECTION 4**

**PERMANENT (POST-CONSTRUCTION) STORMWATER MANAGEMENT PROGRAM**

**STRUCTURAL AND NON-STRUCTURAL STRATEGIES**

1. Does the municipality currently have in place mechanisms or strategies to address permanent stormwater runoff management from new development or redevelopment projects that result in land disturbance of one acre or more? For example, land use planning requirements, zoning directives, site-based local controls such as riparian buffer zone protection; storage or detention of stormwater prior to release to streams; practices to cause stormwater to percolate the soil rather than runoff immediately; vegetative practices.

Yes ☒

No ☐

If Yes, please provide a brief narrative of - and/or references to - the structural and non-structural strategies, describing strategies implemented, Best Management Practices allowed, technical guidance, responsible departments, and personnel (by title).

A Stormwater Management Plan is required along with a detailed maintenance and repair plan outlining the steps to be taken to keep the permanent structure maintained, maintenance easements and maintenance agreements by property owners. The plan is reviewed by the Level 2 inspectors for compliance with the Stormwater Ordinance (Karen Smith and Randy Harville), Planning and Zoning Department (Jim Lech and Karen Smith), and Public Works (Frank Wilkerson) In some cases a civil engineer may need to review plans. The Planning Commission reviews all development sites.

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**PERMANENT STORMWATER CONTROLS SITE MANAGEMENT ORDINANCE**

1. Do you currently have an ordinance or regulatory mechanism that addresses permanent stormwater runoff management from new development and redevelopment projects? If yes, reference the page number in your ordinance. If No, proceed to the next section on permanent stormwater management plans review.
- Yes ☒ No ☐ 22 and 30 Page Number 19-108 and (b) Paragraph Number
2. Does the ordinance or regulatory mechanism require controls to mitigate pollutants in stormwater runoff? If yes, note page number and paragraph number.
- Yes ☒ No ☐ 28 and 30 Page Number (c ) and (b) Paragraph Number
3. Does the ordinance or regulatory mechanism require (explicitly or implicitly) that controls be implemented for any new development or redevelopment projects greater than or equal to one acre, including projects less than one acre that are part of a large common plan of development or sale, that discharge into your small MS4? If yes, note page number and paragraph number.
- Yes ☒ No ☐ 12 and 14 Page Number 19-104 (a) and (10) Paragraph Number
4. Does the ordinance or regulatory mechanism contain or reference technical standards for water quality controls (e.g., design of detention basins)? If yes, note page number and paragraph number.
- Yes ☒ No ☐ 17-22 Page Number 19-106 Paragraph Number
5. Does the ordinance or regulatory mechanism clearly define the criteria for submittal -who must submit - of permanent stormwater management design information or plans? If yes, note page number and paragraph number.
- Yes ☒ No ☐ 14 Page Number (10) (e) Paragraph Number
6. Does the ordinance or regulatory mechanism require approval prior to construction of permanent stormwater management controls? If yes, note page number and paragraph number.
- Yes ☒ No ☐ 14 Page Number (e) Paragraph Number
7. Does the ordinance or regulatory mechanism require re-submittal of permanent stormwater management design information or plans if site plans change after the initial design has been approved? If yes, please note page number and paragraph number.
- Yes ☒ No ☐ 22 Page Number 19-108 Paragraph Number
8. Does the ordinance or regulatory mechanism give the MS4 owner/operator the authority to penalize the owner of permanent stormwater management controls for violations? If yes, note page number and paragraph number.
- Yes ☒ No ☐ 33 Page Number 19-112 and 19-113 Paragraph Number
9. Does the ordinance or regulatory mechanism allow the municipality right-of-entry on property where permanent stormwater management controls are installed for inspections? If yes, please note page number and paragraph number.
- Yes ☒ No ☐ 15 and 26 Page Number (h) and (c ) Paragraph Number
10. Does the ordinance or regulatory mechanism require that permanent stormwater management controls have adequate and long-term operation and maintenance? If yes, please note page number and paragraph number. If no, how does the MS4 owner/operator maintain permanent stormwater management controls?
- Yes ☒ No ☐ Page 18, Paragraph (e)
11. Does the ordinance or regulatory mechanism require establishment and maintenance of water quality buffers in areas of new development and redevelopment?
- Yes ☒ No ☐

**PERMANENT STORMWATER MANAGEMENT PLANS REVIEW**

1. Does the municipality presently have in place a technical review process (i.e. engineering department, planning department, zoning board) that evaluates new development and redevelopment with regard to the impact that permanent stormwater runoff will have on receiving streams?
- Yes ☒ No ☐
- If Yes, provide a brief narrative or a flow chart of the review process, describing the process steps, responsible personnel (by department, title and contact person), and criteria used for evaluation of information or plans that are submitted.

Plans are distributed to each Planning Commissioner, City Manager, City Planner, Public Works Director, Fire Chief and Codes Administrator (Stormwater Manager). A Plans Review Session is scheduled and each recipient is requested to be present or send their report. Any requested corrections are due prior to the Planning Commission Meeting. A hydrology study is required and is reviewed by the civil engineer and sent on to the Planning Commission as for their final review.

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BEST MANAGEMENT PRACTICES (BMPs) MEASURABLE GOALS AND IMPLEMENTATION MILESTONES		
	Name	DESCRIPTION
A.	Compile list of all permanent BMP's	Compile a list of all permanent BMP's in the city with a list of persons responsible for the upkeep and begin annual inspections
B.	Ordinance	Review and update Post-Construction Ordinance as needed
C.	Education	Educate owners and operators of sites with permanent BMP's
D.	maintenance and Repair Plan	Require a Maintenance and Repair Plan on all new Permanent BMP's as well as recorded Maintenance Easements

ADMINISTRATIVE INFORMATION	
PRIMARY CONTACT	POSITION OR TITLE
Karen Smith	Codes Administrator/Stormwater Manager

OTHER DEPARTMENT	ROLE
Public Works	Review of Plans and field work when required
Planning	Heads the Plans Review Session and follows up with applicant for required corrections
Codes	Review of plans and field inspections

GOVERNMENT ENTITY	BMP

OTHER INSTITUTION	ROLE
Engineering Companies	use as consultants on a contractual basis

EQUIPMENT NEEDS (IF APPLICABLE)	

GROUP	TARGET DESCRIPTION
Existing permanent BMP owners and responsible parties	to insure that all BMP's are adequately maintained and repaired when necessary
New developers/builders using permanent BMP's	to insure that the permanent Stormwater facilities are constructed as approved and that the post-construction levels are maintained as approved as well as maintenance and repair plans are followed.

SECTION 5 POLLUTION PREVENTION AND HOUSEKEEPING STAFF EDUCATION AND TRAINING	
1. Does the municipality's current operation and maintenance program provide annual training for staff on preventing and reducing stormwater pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance?	
Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
2. Are training activities documented? If yes, please describe training and method of record-keeping.	
Yes <input checked="" type="checkbox"/>	<div style="border: 1px solid black; padding: 5px;">           Training that is performed in-house requires a record of attendance and documentation of material covered during the training. Training performed at other locations requires similar documentation along with any certification or training certificates issued being kept on file. Sessions usually run 1-2 hours when held in-house and include handouts, videos, PowerPoint Presentations and lectures. We have used Cumberland River Compact and MTAS as outside sources for training in the past.         </div>
No <input type="checkbox"/>	



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**MUNICIPAL OPERATIONS POLLUTION PREVENTION**

1. Does the municipality's operations and maintenance program have policies and procedures in place that address pollution prevention? If yes, please describe procedures. Consider the following in your response: maintenance activities, maintenance schedules; long term inspection procedures for structural and non-structural stormwater controls to reduce floatables and other pollutants; controls for reducing or eliminating the discharge of pollutants from streets, roads, highways; controls for reducing or eliminating pollutants from municipal parking lots, maintenance and storage yards, fleet or maintenance areas with outdoor storage areas, salt/sand storage areas, snow disposal areas, waste transfer stations; disposal of waste removed from storm sewers and the areas listed above; and assessment of impacts on water quality from new flood management projects.

Yes ☒  
 No ☐

A written Standard Operating Procedure and follow Best Management Practices

**MUNICIPAL INDUSTRIAL ACTIVITIES**

1. Has the MS4 owner/operator obtained a Tennessee Multi-Sector General Permit or a no-exposure waiver for all qualifying municipal industrial activities? If yes, please give permit numbers or copy of the No-Exposure Certification form.

Yes ☒

No ☐

Permit Numbers(s)

List municipally-owned or operated facilities that have a notable potential for contaminating runoff: for example - vehicle maintenance garages; waste transfer operations; golf courses; salt or other materials storage; landfill. If more than one facility for a given type of operation; give the number of such facilities. Indicate if any of these are covered by an NPDES permit. Is there a documented pollution prevention plan in place for these facilities?

FACILITY OR TYPE OF OPERATION	NUMBER	IS ACTIVITY COVERED BY NPDES PERMIT?	IS A POLLUTION PREVENTION PLAN IN EFFECT?
Public Works Operations	1	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Fire Department	2	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Administration Offices	1	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Police Department	1	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

In addition to considering industrial-type operations, you must also consider municipal infrastructure, and related maintenance activities, maintenance schedules and long-term inspection procedures for structural controls and the proper disposal of waste from storm sewers/catch basins, etc. Also included in this program area is discharge of pollutants from roads and parking lots.

**BEST MANAGEMENT PRACTICES (BMPs) MEASURABLE GOALS AND IMPLEMENTATION MILESTONES**

	Name	DESCRIPTION
A.	Municipal Infrastructures	Maintenance and inspections are carried out on a regular basis; disposal of the waste is disposed as per BMP's
B.		
C.		
D.		

**ADMINISTRATIVE INFORMATION**

PRIMARY CONTACT	POSITION OR TITLE
Frank Wilkerson	Public Works Director
OTHER DEPARTMENT	ROLE

**BEST MANAGEMENT PRACTICES (BMPs) MEASURABLE GOALS AND IMPLEMENTATION MILESTONES (Continued)**

GOVERNMENT ENTITY	BMP

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OTHER INSTITUTION	ROLE
EQUIPMENT NEEDS (IF APPLICABLE)	
GROUP	TARGET DESCRIPTION
Municipal Employees	Annual training program and onsite instruction
Inspectors	Training level II to be kept up to date

**ADDENDUM TO SMALL MS4 NPDES PERMIT NOTICE OF INTENT**  
**BEST MANAGEMENT PRACTICES (BMPs) MEASURABLE GOALS AND MILESTONES**

The purpose of this addendum is to record the measurable goals for each BMP, and the dates (month and year) by which interim actions are to be accomplished. Space is given for four BMPs for each of the six minimum measures.

Measurable goals are BMP design objectives, or goals that will quantify the progress of implementing the actions or performance of a BMP. They are ways to measure activities or effects of a BMP. For each of the six minimum measures and for each BMP, define the measurable goal you will use to monitor effectiveness of this BMP.

For each BMP, establish milestones for implementation. These tables are set up for once/year milestones. You may change the milestone dates to time frames less than one year. Also, certain BMPs - e.g., an ordinance - should be put in place within one year.

<b>BEST MANAGEMENT PRACTICES FOR PUBLIC EDUCATION, OUTREACH, AND PARTICIPATION</b>	
BMP 1A	MEASURABLE GOALS AND MILESTONES
Goals	Educate the General Public
Milestone Year 1	Develop a Public Information and Education Plan (PIE Plan) for the City of Millersville; Continue to distribute information through events, teacher packets, information table at City Hall, website, CityLink email database, notes on the sewer bills, using education in lieu of penalties for first Stormwater Related offenses, etc.
Milestone Year 2	Hold Workshop for priority listed Business owners and operators and continue to use information distribution as previous year - Use Stream Watch Committee (citizen-based) to help review Stormwater Ordinance
Milestone Year 3	review and update the (PIE) as needed and continue to use information distribution as previous years
BMP 1A	MEASURABLE GOALS AND MILESTONES (CONTINUED)
Milestone Year 4	Hold Workshop for priority listed Business owners and operators and continue to use information distribution as previous years - Use Stream Watch Committee (citizen-based) to help review Stormwater Ordinance
Milestone Year 5	review and update the (PIE) as needed and continue to use information distribution as previous years
BMP 1B	MEASURABLE GOALS AND MILESTONES
Goals	Educate Students and Teachers
Milestone Year 1	Continue to promote in-service workshops for teachers that emphasize stormwater education such as Project Wet and Project Learning Tree; continue to provide teachers with information packets that include stormwater education and activities; offer videos, DVD's and computer interaction disks for library checkout (includes homeschooling teachers and their students)
Milestone Year 2	Continue as previous year
Milestone Year 3	Continue as previous year
Milestone Year 4	Continue as previous year
Milestone Year 5	Continue as previous year
BMP 1C	MEASURABLE GOALS AND MILESTONES
Goals	Educate special interest groups such as the Garden Club, girl and boy scout troops and/or Civic Club and promote the R.I.D. Campaign (Report Illegal Dumping-signs placed throughout Millersville with phone number to report pollution)

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Milestone Year 1	Encourage groups to participate in stream cleanup events and use the time to offer instruction in clean water and troops could earn badges such as the Water Drop Patch for Girl Scouts - get word out about the R.I.D. Campaign through promotional materials
Milestone Year 2	Offer special educational opportunities to Civic Club and Garden Club as well as continue as previous year - get word out about the R.I.D. Campaign through website promotions
Milestone Year 3	Encourage groups to participate in stream cleanup events and use the time to offer instruction in clean water and troops could earn badges such as the Water Drop Patch for Girl Scouts - get word out about the R.I.D. Campaign through promotional materials
Milestone Year 4	Offer special educational opportunities to Civic Club and Garden Club as well as continue as previous year - get word out about the R.I.D. Campaign through help of special interest groups (may distribute with bake sale items, during meetings, etc.
Milestone Year 5	Encourage groups to participate in stream cleanup events and use the time to offer instruction in clean water and troops could earn badges such as the Water Drop Patch for Girl Scouts - get word out about the R.I.D. Campaign through promotional materials
<b>BMP 1D</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goals	Educate local businesses
Milestone Year 1	Visit business site and provide inspection and educational materials and answer questions
Milestone Year 2	Continue as previous year
Milestone Year 3	Continue as previous year
Milestone Year 4	Continue as previous year
Milestone Year 5	Continue as previous year

<b>BEST MANAGEMENT PRACTICES FOR ILLICIT DISCHARGE DETECTION AND ELIMINATION</b>	
<b>BMP 2A</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goals	Monitor all identified outfalls for possible illicit discharges and continue visual assessments
Milestone Year 1	Walk 1/2 length of Slaters Creek and compare the last assessment with current findings
Milestone Year 2	Complete the walk of Slaters Creek and compare findings
Milestone Year 3	Walk north tributary to Slaters Creek and locate outfalls and determine the possibility of illicit discharges
Milestone Year 4	Walk 1/2 length of Manskers Creek and compare the last assessment with current findings
Milestone Year 5	Complete the walk of Mansker Creek and compare findings
<b>BMP 2B</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goals	Continue to promote the "Report Illegal Dumping" and other pollution Campaign and get the citizenry behind the program
Milestone Year 1	Continue promoting R.I.D.
Milestone Year 2	Continue promoting R.I.D.
Milestone Year 3	Continue promoting R.I.D.
Milestone Year 4	Continue promoting R.I.D.
Milestone Year 5	Continue promoting R.I.D.
<b>BMP 2C</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goals	Participate in and involve public groups in World Water Monitoring Day to test for pH levels, Dissolved Oxygen, temperature, and turbidity. Continue to hold Stream Watch meetings and encourage the committee members to monitor their assigned section of the stream. Encourage new membership. Label all storm drains that have not previously been marked
Milestone Year 1	Continue as in previous year
<b>BMP 2C</b>	<b>MEASURABLE GOALS AND MILESTONES (CONTINUED)</b>
Milestone Year 2	Continue as in previous year
Milestone Year 3	Continue as in previous year
Milestone Year 4	Continue as in previous year

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Milestone Year 5	Continue as in previous year
<b>BMP 2D</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goals	Continue to inspect all "hot Spot" areas and educate the owners and operators
Milestone Year 1	Use inspection schedule to insure that all priority sites have been inspected and held to compliance.
Milestone Year 2	Continue as in previous year
Milestone Year 3	Continue as in previous year
Milestone Year 4	Continue as in previous year
Milestone Year 5	Continue as in previous year

<b>BEST MANAGEMENT PRACTICES FOR CONSTRUCTION SITE RUNOFF CONTROL PROGRAM</b>	
<b>BMP 3A</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goals	Continue pre-construction conferences and Construction site inspections
Milestone Year 1	begin to require pre-construction meetings on all land disturbances requiring a permit and continue construction site inspections after every rain event and at least once a month. Step up inspections on priority sites as well as problem sites to weekly and following rain events - continue documentation of each inspection and meeting
Milestone Year 2	continue as in previous year
Milestone Year 3	continue as in previous year
<b>BMP 3A</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Milestone Year 4	continue as in previous year
Milestone Year 5	continue as in previous year
<b>BMP 3B</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goals	Review and update current ordinance to remain in compliance with permit requirements
Milestone Year 1	Review ordinance to insure compliance - enlist the help of the Stream Watch Committee
Milestone Year 2	continue as in previous year
Milestone Year 3	continue as in previous year
Milestone Year 4	continue as in previous year
Milestone Year 5	continue as in previous year
<b>BMP 3C</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goals	Complete site plan review checklists and review all site plans for compliance with BMP's and erosion prevention and sediment control
Milestone Year 1	Conduct and document all site plan reviews using the checklist and plans review forms
Milestone Year 2	continue as in previous year
Milestone Year 3	continue as in previous year
Milestone Year 4	continue as in previous year
Milestone Year 5	continue as in previous year
<b>BMP 3D</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goals	Continue enforcement with penalties, but add education in lieu of enforcement for first time offenders
Milestone Year 1	Create an educational process for first time offenders to help them understand the violation and incentivize them not to be a repeat offender -the education will include information on the assessment of fines.
Milestone Year 2	continue as in previous year
Milestone Year 3	continue as in previous year
Milestone Year 4	continue as in previous year
Milestone Year 5	continue as in previous year

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<b>BEST MANAGEMENT PRACTICES FOR PERMANENT STORMWATER RUNOFF CONTROL</b>	
<b>BMP 4A</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goals	Compile a list of all permanent BMP's in the city with a list of persons responsible for the upkeep and begin annual inspections
Milestone Year 1	Compile the list and set an inspection schedule and begin to implement with follow-up and enforcement or abatement as needed
Milestone Year 2	Continue with annual inspections
Milestone Year 3	Continue with annual inspections
Milestone Year 4	Continue with annual inspections
Milestone Year 5	Continue with annual inspections
<b>BMP 4B</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goals	Review and update Post-Construction Ordinance as needed
Milestone Year 1	Review Ordinance, solicit the help of Stream Watch Members, and update as needed
Milestone Year 2	Continue as in previous year
Milestone Year 3	Continue as in previous year
Milestone Year 4	Continue as in previous year
Milestone Year 5	Continue as in previous year
<b>BMP 4C</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goals	Educate owners and operators of sites with permanent BMP's
Milestone Year 1	Prepare handouts and other educational materials to distribute - include information on the assessments of fines - also use education in lieu of initial fines
Milestone Year 2	Continue the dialogue with owners and operators and update educational materials and distribute
<b>BMP 4C</b>	<b>MEASURABLE GOALS AND MILESTONES (CONTINUED)</b>
Milestone Year 3	Continue as in previous year
Milestone Year 4	Continue as in previous year
Milestone Year 5	Continue as in previous year
<b>BMP 4D</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goals	Require a Maintenance and Repair Plan on all new Permanent BMP's as well as recorded Maintenance Easements
Milestone Year 1	Begin to require written plans and proof of recorded easements with all permanent BMP's
Milestone Year 2	Continue as in previous year
Milestone Year 3	Continue as in previous year
Milestone Year 4	Continue as in previous year
Milestone Year 5	Continue as in previous year

<b>BEST MANAGEMENT PRACTICES FOR MUNICIPAL POLLUTION PREVENTION AND GOOD HOUSEKEEPING</b>	
<b>BMP 5A</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goals	Training
Milestone Year 1	Continue training new hires and current employees in good housekeeping and Standard Operating Procedures of all aspects of Pollution Prevention
Milestone Year 2	Continue as in previous year
Milestone Year 3	Continue as in previous year
Milestone Year 4	Continue as in previous year
Milestone Year 5	Continue as in previous year

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<b>BMP 5B</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goals	Annual review of SOP and Good Housekeeping Measures
Milestone Year 1	Review annually and update procedures as needed
Milestone Year 2	Continue as in previous year
Milestone Year 3	Continue as in previous year
<b>BMP 5B</b>	<b>MEASURABLE GOALS AND MILESTONES (CONTINUED)</b>
Milestone Year 4	Continue as in previous year
Milestone Year 5	Continue as in previous year
<b>BMP 5C</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goals	Maintain and update SWPPP
Milestone Year 1	Review and update SWPPP, and develop inspection checklists and assign inspections and documentation to competent employees
Milestone Year 2	Continue as in previous year
Milestone Year 3	Continue as in previous year
Milestone Year 4	Continue as in previous year
Milestone Year 5	Continue as in previous year
<b>BMP 5D</b>	<b>MEASURABLE GOALS AND MILESTONES</b>
Goals	Maintenance and inspection schedule
Milestone Year 1	Develop a schedule for inspecting and maintaining all city infrastructures
Milestone Year 2	Use the schedule to implement inspections and maintenance
Milestone Year 3	Continue as in previous year
Milestone Year 4	Continue as in previous year
Milestone Year 5	Continue as in previous year